

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILD SALMON RIVERS d/b/a THE  
CONSERVATION ANGLER; and WILD  
FISH CONSERVANCY,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES  
SERVICE; and UNITED STATES  
DEPARTMENT OF COMMERCE,

Defendants.

Case No. 2:25-cv-00116-JHC

FOURTH STIPULATED MOTION  
TO EXTEND INITIAL  
DEADLINES AND ORDER

**STIPULATED MOTION**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs Wild Salmon Rivers d/b/a/ The Conservation Angler and Wild Fish Conservancy (collectively, “Conservation Groups”) and Defendants the U.S. Department of Commerce and National Marine Fisheries Service (collectively, “the Service”) hereby stipulate and respectfully move the Court to extend the initial deadlines set by the Court’s Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, Dkt. No. 11, as amended by the Court’s Orders granting the parties’ prior Stipulated Motions to Extend Initial Deadlines, Dkts. 13, 17, 22, by 7 days.

The Court's initial scheduling order directed the Conservation Groups and the Service (collectively, the "Parties") to complete their Rule 26(f) conference by April 16, 2025, make their Rule 26(a)(1) initial disclosures by April 30, 2025, and file their combined joint status report and discovery plan by May 7, 2025. Dkt. 11. The Parties previously requested three modest extensions of those deadlines to allow the Parties to continue to focus their efforts on settlement. *See* Dkts. 12, 16, 20. The Court granted these requests. Dkts. 13, 17, 22.

The Parties now request that the Court extend these deadlines by an additional 7 days. Good cause exists for the requested extension. As described in the Parties' prior extension request, the Parties have reached an agreement-in-principle and drafted the relevant settlement documents. Dkt. 20 at 2. The Parties' prior request also explained that additional time was necessary to allow approving officials within the Department of Justice time to review and consider the proposed settlement, and to provide the requisite approvals. *Id.* Department of Justice officials continue to review the proposed settlement, and additional time is needed to provide requisite approvals. Accordingly, the Parties stipulate to and move the Court for a 7-day extension of the deadlines set by the Court as follows:

| Deadline   | Current Schedule | Proposed Amended Schedule |
|--|------------------|---------------------------|
| FRCP 26(f) Conference  | June 30, 2025    | July 7, 2025              |
| Initial Disclosures Pursuant to FRCP 26(a)(1)  | July 14, 2025    | July 21, 2025             |
| Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) | July 21, 2025    | July 28, 2025             |

RESPECTFULLY SUBMITTED this 27th day of June 2025.

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*Attorneys for Defendants*

**ORDER**

PURSUANT TO STIPULATED MOTION, IT IS SO ORDERED.

DATED 27th day of June, 2025.

  
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JOHN H. CHUN  
United States District Judge